

REMARKS

Applicants appreciate the detailed examination evidenced by the final Office Action mailed June 20, 2005 (hereinafter "final Office Action"). Applicants request reconsideration and withdrawal of the rejections of Claims 1-41 in light of following remarks. In the interest of brevity, Applicants incorporate the remarks in Applicants' Amendment of February 16, 2005 by reference, and focus herein on the "Response to Arguments" provided in the final Office Action.

Independent Claims 1, 20, 23, and 37 are patentable

In the Amendment of February 16, 2005, the claims were amended to clarify that the recited "three-dimensional product presentation space" is representative of a *physical scene*, such as a room, open-air market, industrial site or the like, and that the navigation occurs *in* such a space, *i.e.*, in the scene. The final Office Action responds by asserting that Bakoglu "allows for any number of shared presentation spaces including a physical scene as shown in figures 5 and 6." Final Office Action, p.2.

Bakoglu describes an online computer support system. Referring to the specific cited figures of Bakoglu, FIG. 5 shows a "screen image 290 of the VAIO Space navigator in the preferred embodiment along with a Sony Online Support (SOS) icon 292 used to launch the SOS system of the present invention." Bakoglu, column 6, lines 15-20. In other words, the "VAIO space" shown in FIG. 5 is used by the support-seeking customer to invoke the computer support system. The *customer* controls navigation in this VAIO space, not the customer service representative. Thus, with respect to the VAIO Space shown in FIG. 5, Bakoglu does not disclose or suggest, among other things "controlling navigation in the three-dimensional product presentation space at the second computer from the first computer," *i.e.*, the computer at which the sales representative is located.

FIG. 6 of Bakoglu shows "an initial window presented to the user after a connection with the Customer Service Center is made." Bakoglu, column 6, lines 34-35. Although the window includes an image 316 of the customer service representative that can be a real-time video with synchronized audio (see Bakoglu, column 6, line 61 through column 7, line 10), Bakoglu appears to provide no *navigation* within the space inhabited by the customer service representative. Accordingly, Applicants submit that FIG. 6 of Bakoglu also does not disclose

or suggest "controlling navigation in the three-dimensional product presentation space at the second computer from the first computer."

Moreover, Bakoglu does not disclose or suggest that the VAIO space shown in FIG. 5 or the image shown in FIG. 6 are generated *at both the customer's computer and the service representative's computer*. There clearly is no disclosure or suggestion in Bakoglu that the same VAIO space shown in FIG. 5 is generated at both the customer's computer and the service representative's computer. Referring to the description of FIG. 6 (and the related description of FIG. 7), Bakoglu describes presenting *different* screens to the customer and the customer service representative. Although Bakoglu states that video cameras may be present at both the customer's location and the customer service representative's location (see column 7, lines 13-14), such that the customer service representative could also view the customer in a manner similar to that shown in FIG. 6, such cameras would provide images of *different* locations. Accordingly, Applicants submit that Bakoglu also does not disclose or suggest "generating respective first and second displays of a three-dimensional product presentation space representative of a physical scene at respective ones of the first and second computers."

As noted in Applicants' Amendment of February 16, 2005, the cited portion of the abstract of Tavor simply states that the system described therein "adds graphics, animation, 3D, movie clips, voice and other effects to make the session enjoyable for the customer," and the cited passage at column 5, lines 5-17 of Tavor describes provision of a "virtual sales representative for interacting with a customer browsing a virtual store web site." Neither of these passages disclose or suggest the above-discussed missing teachings from Bakoglu, i.e., "controlling navigation in the three-dimensional product presentation space at the second computer from the first computer" and "generating respective first and second displays of a three-dimensional product presentation space representative of a physical scene at respective ones of the first and second computers."

For at least these reasons and the reasons provided in Applicants' Amendment of February 16, 2005, the cited combination of Bakoglu and Tavor does not disclose or suggest all of the recitations of independent Claim 1 or the related recitations of Claims 20, 23, and 37. Accordingly, Applicants submit that independent Claims 1, 20, 23 and 37 are patentable over Bakoglu and Tavor.

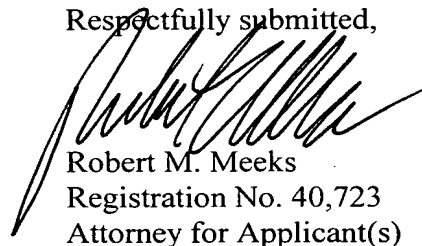
The dependent claims are patentable

Applicants submit that the dependent claims are patentable at least by virtue of the patentability of the various ones of the patentable independent Claims 1, 20, 23, and 37 from which they depend. Applicants further submit that several of the dependent claims are separately patentable for at least the reasons provided in Applicants' Amendment of February 16, 2005.

Conclusion

Applicant submits that the objections to and rejections of the claims are overcome for at least the reasons discussed above, and that the claims are, therefore, in condition for allowance, which is respectfully requested. Applicant encourages the Examiner to contact the undersigned by telephone to resolve any remaining issues.

Respectfully submitted,



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